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| FILED ENTERED | RECEIVED SERVED ON COUNSEL/PARTIES OF RECORD |
| NOV - 7 2018 | |
| CLERK US DISTRICT COURT DISTRICT OF NEVADA | |
| BY: | DEPUTY |

1 Jesse A. Ross #109575G
 2 HOSP. P.O. BOX 650
 3 Indian Springs
 4 NV 89070

5
 6 UNITED STATES DISTRICT COURT
 7 DISTRICT OF NEVADA

8 Jesse Aron Ross,
 9 Plaintiff,

10 -VS-

11 BRIAN Sandoval et al.,
 12 Defendants.

CASE NO:

2:17-cv-02386-APG-GWF

Oral Argument Requested *

Motion for Costs & Fees
 (Fed. R. c.v. P. Rule 54(d)(1))

14 Associated with; [ECF No: 48],
 15 Plaintiff's motion for Preliminary
 16 Injunction NO: 2

17 —————

18 Comes now above named plaintiff; appearing pro se,
 19 incarcerated; To respectfully request the court award, consistent
 20 with Fed. R. c.v. P. Rule 54 (A), Plaintiff reasonable costs,
 21 and fees. This motion is based upon the papers and
 22 pleadings on file, the attached memorandum of points
 23 & authorities, as well as any oral argument
 24 permitted @ the hearing of this matter.

25

26 ★ Per usdc.D.Nev Local Rules LR II 78-1 [civil]

27

28 Certificate of Service Attached.

1 MEMORANDUM OF POINTS & AUTHORITIES.

2

3 I. Summary of the Argument

4

5 Plaintiff respectfully requests this court
6 award plaintiff reasonable expenses associate
7 with the preparation, filing of [ECF No. 48]
8 Plaintiff motion for preliminary Injunction No. 2
9 (hereinafter "ECF No. 48"), consistent with
10 Applicable Rules, statutes and 9th Cir Jurisprudence
11 listed herein.

12

13 II. Pertinent Procedural history

- 14 (A) On 12-18-17 Plaintiff filed A First Amended [Civil]
15 ^{Second} complaint ("FAC"), ECF No. 19
- 16 (B) On 08-10-18 Plaintiff Filed A motion for A preliminary
17 Injunction No. [ECF no. 48], A Appendix Brief [ECF No. 49]
- 18 (C) On 08-30-18, Plaintiff Filed A supplemental
19 Appendix Brief [ECF No. 56]
- 20 (D) On 09-06-18 The Defendants Filed an opposition
21 to Plaintiff's motion for preliminary Injunction No. 2,
22 [ECF No. 57]; Along with A 120 page Appendix
- 23 (E) On 09-14-18 Plaintiff filed A reply to; the defendants
24 opposition to; Plaintiff's motion for preliminary
25 Injunction No. 2
- 26 (F) On 10-15-18 The court conducted 1915 screening
27 of the Second Amended [Civil] complaint [ECF No. 19],
28 stayed the action pending possible mediation resolution, for

1 90 days -

- 2 (1) On 10-19-18, even though the action was stayed
 3 per the 10-15-18 § 1915 order, The Court granted
 4 in part plaintiff's motion for preliminary injunction
 5 No. 2 (Herein After Referred to As ECF No: 48)
 6 (H) Plaintiff timely filed a "Bill of Costs" with
 7 the court cler.

8

9 III Table of Authorities

PAGE First cited:

| | | | |
|---------|---|--------------|---|
| 10 (1) | Worsoldier-v-Woodford | 418 F.3d 989 | |
| 11 | (9 th Cir 2005) | | 4 |
| 12 (2) | Crawford Fitting Co.-v-J.T. Gibbons | | |
| 13 | Inc 482 U.S. 437 [1987] | | 4 |
| 14 (3) | McGill-v-Faulkner 18 F.3d 456 [7 th Cir 1994] | | 5 |
| 15 (4) | Sanders-v-Senbold 188 F.3d 509 [6 th Cir 1999] | | 5 |
| 16 (5) | Burt-v-Hennessey 929 F.2d 457 [9 th Cir 1991] | | 6 |
| 17 (6) | Jermosen-v-Smith 733 F. Supp. 13 [W.D.N.Y 1990] | | 6 |
| 18 (7) | Howard-v-Connett 2017 U.S. Dist Lexis 17213 | | |
| 19 | D.N.V. 10-17-17 | | 7 |
| 20 (8) | Coleman-v-Turner 838 F.2d 1004 [8 th Cir 1988] | | 7 |
| 21 (9) | Hadicix-v-Johnson 322 F.3d 895 [6 th Cir 2003] | | 7 |
| 22 (10) | Fed.R.Civ.P. Rule 54 | | 4 |
| 23 (11) | Fed.R.Civ.P. Rule 65 | | 4 |
| 24 (12) | 28 USC § 1292(a)(1) | | 4 |
| 25 (13) | 28 USC § 1920 | | 4 |
| 26 (14) | 28 USC § 1915(F)(2)(A) | | 5 |
| 27 (13) | 42 USC § 1998 | | 6 |
| 28 (16) | 28 USC § 1924 | | 7 |

1 IV Legal Standard

2
3 The Federal rules of civil procedure ("FRCP")
4 provide that a prevailing party may recover costs
5 and reasonable expenses associated with judgments
6 (see FRCP Rule 54). This same rule also clearly
7 & concisely defines what a "judgment" is. In
8

9 "Judgment" as used in these rules includes a
10 decree and any order from which an appeal lies."
11 FRCP Rule 54(a).

12
13 A motion for a preliminary injunction under FRCP
14 rule 65 is automatically appealable upon the
15 court's order. title 28 USC § 1292(a)(1); see also
16 *warsoldier-r. woodford* 418 F.3d 989 @ 991 9th cir 2005.

17
18 Actual costs do not include every expenditure
19 that a litigant makes in the course of litigation,
20 they are in fact limited to specific items listed
21 in 28 USC § 1920, including --- copies of
22 necessary documents --- and a few other items,
23 (~~crawford or~~ *crawford fitting co -v- J.T. Gibbons Inc.*
24 982 U.S. 437 @ 441-42 [1987]). The District
25 court has substantial discretion whether and to
26 what extent to tax costs for those items. ID.

1 A Pro-Se Litigant may be awarded costs on the
2 same basis as any other Litigant, (coleman-v-turner
3 838 F.2d 1004 @ 1005 [8thCir 1988]), And may have
4 costs imposed against him even if he is a pro-se -
5 IFP - Prisoner (mcGILL-V-Faulkner 18 F.3d 456 @
6 460 [7thCir 1994]; Sanders -v-Senbold 188 F.3d
7 509 @ 509 [6thCir 1999]; § 17,989.90 costs; \$15,750
8 Attorney Fees), and 28 USC § (F)(2)(A) 1915(F)(2)(A)
9

10 FRCP Rule 54(d)(1):

11
12 "unless a federal statute, these rules or a
13 court order provides otherwise, costs - other
14 than Attorney fees - should be allowed to
15 the prevailing party. But ~~costs~~ - - - -

16 - - - - The Clerk may tax costs on 14
17 days notice. on motion served within
18 the next 7 days, the court may review
19 the clerks action.

20
21 Attorneys Fee's and related Expenses.

22
23 FRCP Rule 54(d)(2):

24
25 "Attorney fees.

26 (A) claim to be by motion. A claim for Attorney
27 Fee's and related non taxable expenses must
28 be made by motion unless the substantive

"requires those fees to be proved @ trial
as an element of Damages,

(B) Timing and contents of the motion. Unless
a Statute or Court provides otherwise, the
motion must:

(i) be filed no later than 14 days after the
entry of Judgement;

(ii) specify the Judgement and the Statute, rule
or other grounds entitling the movant to
the award;

(iii) state the amount sought or provide a fair
estimate of it; and

(iv) disclose if the court so orders, the terms
of any agreement about Fee's for which
the services for which the claim is made."

Attorney' Fees statutes also permit that pro-se
Plaintiff's may recover these expenses, even though
they are not entitled Attorneys Fee's.

A pro-se Plaintiff may recover litigation expenses
to extent attorney could receive them under
a Award of Attorney Fee's pursuant to
42 USC § 1988. (Burt -v- Hennessy
929 F.2d 457 @ 459 [9th Cir 1991]),
~~Maryberry -v- Watters~~ (Jermser -v- Smith
733 F. Supp 13 @ 14 (WD NY 1990)).

1
2 The U.S. District Court, District of Nevada
3 Has in fact addressed Legal Assistant/
4 Paralegal Fee's Associated with Litigation
5 In Howard -v- Cennett 2017 U.S. Dist Lexis
6 17213 (D.Nev 10-17-17 - 2:11-cv-01402 -
7 RFB-GWF) section III, Titled motion for
8 Attorney Fee's sub. Par. "D", Judge RFB
9 granted Legal Ass. Stunt Fee's.
10

11 Finally to recover Costs, the prevailing party
12 files A bill of costs with the court, supported
13 by An Affidavit verifying its correctness,
14 and that the Costs were necessary for
15 the Litigation. (28 USC § 1924).
16

17 V. Legal Argument
18 A. Costs.

19 Plaintiff has submitted A itemized list
20 of Actual Cost's he expended for copy work,
21 and postage Associated with the filing
22 and Reply of ECF NO:48. Plaintiff
23 requests A reasonable \$143.44. see EX.

24 A. This request is Appropriate, and consistent
25 with equity and Precedent (coleman -v- Turner 838
26 F.2d 1004 @ 1005 [8th Cir 1988]; Hadix -v- Johnson 322
27 F.3d 895 @ 902 [6th Cir 2003]).
28

1 (B) Fee's

2 (i) Judgment entitling Plaintiff to Award; and Rule -
3 Statute permitting the same -

4 (a) Judgment = ECF No: 61 in Russ-v-Sandoval et al.,
5 (USDC No: 2:17-CV-C2386-APG-GWF

6 (b) Rule = "FRCP" 54 (A) - defining "Judgment"

7 (c) Statute - 28 USC § 1292(a) (1) - defining appealability
8 of a Rule 65 motion

9 (d) Amount Sought = \$ 925.00 (see EX B pg 3
10 Line 14.

11

12 Plaintiff is clearly not a Licensed attorney,
13 However plaintiff is a honors graduate of
14 Blackstone career Institute ("BCI") ([www.
blackston.edu](http://www.blackston.edu)), which is A Nationally Regionally
15 accredited privately Licensed School, which
16 cost plaintiff substantially Financially for
17 tuition and books, (see EX B pg 3 lines
18 17-28 and EX C pages 1-3). Copy of transcripts
19

20

21 The Ninth Circuit Court of Appeals has
22 held Pro se Plaintiffs may recover Expenses,
23 even though they are not entitled to Actual
24 Attorney Fees, (under the current RATE of \$ 190.50
25 Howard-v-Cannett @ section 3).

26

27 As such Plaintiff Respectfully seeks
28 \$ 50.00 per Hour, In Light of

1 The substantial research and writing, done longhand;
2 It is reasonable. Especially since if plaintiff were to
3 house the AGO were the prevailing party, they would
4 seek costs/fees.

5

6 VI. Conclusion

7 Plaintiff incurred substantial copywork/postage costs. In
8 light of plaintiff's near poverty (plaintiff receives maybe
9 \$140.00 a month). As such this cost is a huge sacrifice, and
10 plaintiff hour after long hour writing his papers longhand, and
11 many hours researching (plaintiff's itemized list of hours is
12 actually very conservative).

13 A Grant or denial ~~of~~ of a preliminary injunction is a
14 "judgement" (according to "FRCP" Rule 54(a)) to which a
15 prevailing party may ~~at~~ the court's discretion, receive
16 costs and fees.

17 Plaintiff respectfully requests this court award:

18

| | | |
|----|--|-------------|
| 19 | Paralegal/legal assistant fees 19.5 hrs \times \$50.00 | = \$975.00 |
| 20 | Actual costs - postage/copy work | \pm 43.44 |
| 21 | Grand total | = \$968.44 |

22 10-26-18

23

24

25

26

27

28

Jesse Ross

Jesse Ross
Pro Se - Plaintiff

EXHIBIT A

Bill of Costs

EXHIBIT A

1 Jesse A. Ross #1095756

2 HOSP - P. O. Box 650

3 Indian Springs NV 89020

4

5 UNITED STATES DISTRICT COURT
6 DISTRICT OF NEVADA

7

8 Jesse Aron Ross,
9 Plaintiff,

CASE NO:

2:17-cv-02386-APG-GWF

10 VS:

11 Brian Sanderson et al.,
12 Defendants

* Plaintiff's "Bill of Costs"
In relation to ECF No: 48 + 60,
Plaintiff motion for preliminary

13
14 Injunction No: 2, and order
Granting Injunction.

15

16

17

18 This Bill of Costs is signed under declaration
19 of penalty of perjury per 28 USC § 1746,
20 NRS 208.165; NRS 53.045. See page 3

21

22 Total Costs Requested - \$143.44

23

24 Fed.R.Civ.P Rule 54(d)(1); 28 USC § 1924

25 This Bill of Costs is directed to the costs associated with
26 the Filing of ECF No: 48; and the Judgement (in accordance
27 with Fed.R.Civ.P Rule 54(a)) entered in ECF No: 61
28 Certificate of service Attached.

1 I. Itemized List of expenses/costs IN RE: ECF No 48
23 A) Plaintiff's motion for preliminary Injunction No: 2
4 [19 PAGES] Copied twice 38 pages = \$ 3.80; Postage
5 \$ 2.20 = \$ 6.006 B) Plaintiff's Appendix Brief; 51 pages copied twice - 102 pages
7 @ \$ 10.20; Postage \$ 6.12 = \$ 16.328 C) Plaintiff's supplement to Plaintiff's Appendix Brief; 51 pages
9 Copied twice - 102 pages @ \$ 10.20 Postage \$ 6.12 = \$ 16.32

10 D) Plaintiff's Reply to; Defendants opposition to;

11 Plaintiff's motion for Preliminary Injunction

12 No. 2 13 page copied twice 26 pages @ \$ 2.60,
13 Postage \$ 2.20 = \$ 4.80

14

15 Prison Photo copies are \$ 10 each, one copy for
16 Plaintiff, one for defendant original to
17 Court, each filing requires snail mail
18 postage to court + \$ 2.60. These costs were necessary.
19

20 Line Item Grand total = \$ 43.44

21

22

23

24

25

26

27

28

1 I understand that a false statement or answer
2 will subject me to the penalties of perjury and/or
3 sanction by this court.
4

5 I Jesse Aron Ross declare under penalty of perjury
6 under the Laws of the United States of America, and,
7 the state of Nevada; that the foregoing is true
8 and correct to the best of my personal knowledge;
9 except those statements based upon information
10 and belief; and as to those I believe them to
11 be true. 28 USC § 1746; NRS 208.165; NRS 53.045.
12

13 signed on 10-26-18 @
14 22010 cold creek Rd
15 (Clark County)
16 Indian Springs NV.
17 89070

x ~~Jesse Ross~~

Declarant:

Jesse Aron Ross

#1095736 - HDSP
P.O. Box 650

Indian Springs NV. 89070

20

21

22

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24

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26

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28

EXHIBIT B

Bill of Costs & Fees

EXHIBIT B

| | |
|---|--|
| FILED ENTERED | RECEIVED SERVED ON COUNSEL/PARTIES OF RECORD |
| NOV - 7 2018 | |
| CLERK US DISTRICT COURT DISTRICT OF NEVADA | |
| BY: | DEPUTY |

1 Jesse A. Ross #109575G
 2 HNGP P.O. Box 650
 3 Indian Springs NV 89070

4

5 UNITED STATES DISTRICT COURT
 6 DISTRICT OF NEVADA

7

8 Jesse A. Ross,
 9 Plaintiff,
 10 VS -

11 BRITAN SANDOVAL et al.,
 12 Defendants.

CASE NO:

2:17-CV-02386-APG-GWF

* Plaintiff's "BILL OF
COSTS" and Fees - In

Relation to [ECF No: 48];

Plaintiff's motion for

Preliminary Injunction No: 2.

17 This Bill of Costs is signed under Declaration
 18 of penalty of perjury; 28 USC § 1746,
 19 NRS 208.165; NRS 53.045.

20

21 Total costs and fees Requested (page 3) = \$ 968.44

22

23

24

25

26

27

28 Certificate of Service Attached.

II. Itemized List of expenses

- 1
2
3 (A) Plaintiff's motion for preliminary Injunction No: 2;
4 19 pages copied twice \$13.80 (38 pages).
5 Postage \$2.20 = \$16.00
6 (B) Plaintiff's Appendix Brief; 51 pages copied twice
7 102 pages \$10.20; Postage \$1.612 + = \$16.32
8 (C) Plaintiff's supplement to Plaintiff's Appendix Brief;
9 51 pages copied twice 102 pages \$10.20; Postage
10 \$1.612 + = \$16.32
11 (D) Plaintiff's Reply to Defendants opposition to;
12 Plaintiff's motion for preliminary Injunction No:2;
13 13 pages copied twice \$12.60 - Postage
14 \$12.20 + = \$14.80
15 Prison photocopies are \$.10 per page.
16 Total Cost For Postage and Prison Copy Work
17 Line items A - D = \$143.44.
18
19 II. Hourly Fee Itemization

- 20 (A) Motion for preliminary Injunction No:2
21 10 Hours of Actual research, writing, organizing
22 Plaintiff's Appendix Brief
23 Requested Fees of 10 hours X \$150.00 = \$1500.00
24 (B) Plaintiff's supplement to Plaintiff's Appendix
25 Brief .5 hour X \$150.00 = \$75.00
26 (C) Reading Defense opposition to Plaintiff's
27 Motion for preliminary Injunction No:2 - .75 hr;
28 and defense Appendix Volume No: I consisting

1 of 16 Exhibits totalling 120 pages; 3.25 hours,
2 4. hours x \$150.00 = \$ 200.00
3 (D) Plaintiff's reply to; Defense opposition to;
4 Plaintiff's Motion for preliminary Injunction 16:2;
5 4.0 hours of Actual Research, cross- Research,
6 And writing. 4 hours x \$150.00 = \$ 200.00
7

8 Note: Plaintiff must Long Hand All papers,
9 an especially onerous TASK.

10
11 Line items section II. A-D = \$ 925.00

12
13 Section I = \$ 43.44
14 Section II = \$ 925.00
15 GRAND total = \$ 968.44
16

17 Plaintiff, Based upon information, Belief and
18 personal Knowledge Believes the Above is
19 true & Accurate Expenditure of expenses

20 I Jesse Ross certify That I Am a Blackstone career

21 Institute graduate (www.blackstone.edu) ("BCI").

22 I certify I graduated with honors (95.80% GPA) on

23 11-07-2017 After 28 months of enrolled study. I Cert'fy

24 that BCI is nationally Accredited by "EAC"; regionally

25 Accredited by "MSE" and A Liscence private school

26 regulated by the pennsylvania state board of private

27 Liscensed schools, and that @ my own expense Paid
28 tuitions and books.

1 I understand that a False statement or Answer
2 will subject me to penalties of perjury and/or
3 sanction by this court.

4

5 I Jesse Aron Ross Declare under penalty of
6 Perjury under the Laws of the United States
7 of America; and the state of Nevada;
8 That the foregoing is true and correct to the
9 best of my personal knowledge; except those
10 statements made upon information & belief; and
11 as to those I believe them to be true.

12 28 USC §1746; NRS 53.045; NRS 208.165

13

14 signed on 26 october 2018

X *Jesse Ross*

15 @ 22010 cold creek rd

16 (Clark County)

Declarant:

17 Indian Springs NV 89070

Jesse Aron Ross

18

#1095756-HDSP

19

P.O. Box 650

20

Indian Springs

21

NV 89070

22

23

24

25

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EXHIBIT C

Plaintiff's Blockstone

- 1) certificate
- 2) school transcripts

EXHIBIT C



who has fulfilled all the requirements prescribed by the School and is entitled

To all of the honors, rights and privileges hereunto abiding among

The Order annually gives a prize in recognition of achievement.

中原書局有限公司
2017

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BLACKSTONE CAREER INSTITUTE

1011 Brookland Road, Suite 300, P.O. Box 3717, Allentown, PA 18106-3717

Student Transcript**31 Lesson Paralegal Studies Certificate Program****915 Clock Hours**

Student: Jesse Ross -1095756
Address: P.O. Box 630
 Indian Springs NV 89070

Student Number: 08032292**Enrollment Date:** 07/01/2015**Completion Date:** 11/07/2017

| Lesson/Subject | Date Completed | Grade | Lesson/Subject | Date Completed | Grade |
|-------------------------------------|----------------|-------|-------------------------------|----------------|-------|
| Lesson: 1 | | | Lesson: 8 | | |
| • Introduction To Law | 08/18/2015 | 100 | • Law of Private Corporations | 09/22/2017 | 95 |
| • Contracts Part I | 08/18/2015 | 95 | • Law of Partnerships Part I | 09/22/2017 | 95 |
| • Contracts Part II | 08/18/2015 | 100 | • Law of Partnerships Part II | 09/22/2017 | 100 |
| • Contracts Part III | 08/18/2015 | 90 | Lesson: 9 | | |
| | | | • Constitutional Law Part I | 09/25/2017 | 100 |
| Lesson: 2 | | | • Constitutional Law Part II | 09/25/2017 | 90 |
| • Law of Torts Part I | 11/06/2015 | 100 | Lesson: 10 | | |
| • Law of Torts Part II | 11/06/2015 | 95 | • Constitutional Law Part III | 10/24/2017 | 95 |
| • Law of Torts Part III | 11/25/2015 | 90 | Lesson: 11 | | |
| • Law of Torts Part IV | 11/25/2015 | 95 | • Legal Research Part I | 10/24/2017 | 100 |
| Lesson: 3 | | | Lesson: 12 | | |
| • Criminal Law Part I | 01/05/2016 | 100 | • Legal Research Part II | 10/30/2017 | 90 |
| • Criminal Law Part II | 01/05/2016 | 100 | Lesson: 13 | | |
| Lesson: 4 | | | • Employability Skills | 10/30/2017 | 95 |
| • Real Property Part I | 08/02/2016 | 100 | Lesson: 14 | | |
| • Real Property Part II | 08/02/2016 | 100 | • Ethics | 11/01/2017 | 100 |
| Lesson: 5 | | | | | |
| • Real Property Part III | 01/16/2017 | 95 | | | |
| • Real Property Part IV | 01/16/2017 | 100 | | | |
| Lesson: 6 | | | | | |
| • Pleadings in Civil Action Part I | 01/16/2017 | 90 | | | |
| • Pleadings in Civil Action Part II | 07/25/2017 | 95 | | | |
| • Practice in Civil Actions | 07/25/2017 | 90 | | | |
| • Criminal Procedure | 07/31/2017 | 85 | | | |
| Lesson: 7 | | | | | |
| • Wills Part I | 09/19/2017 | 100 | | | |
| • Wills Part II | 08/07/2017 | 95 | | | |
| • Trusts | 09/19/2017 | 95 | | | |

Student Average: 95.80% **FINAL****This Document Issued:** 11/07/2017

Blackstone Career Institute

By: *Valerie A. Blalock B.S., M.Ed.*

Registrar

**Blackstone Career Institute
1011 Brookside Rd, Suite 300
Allentown, PA 18106
610-871-0031 FAX: 610-871-0034
Blackstone.edu**

HISTORY

If you search back issues of the World Book Encyclopedia you will find Blackstone listed as one of the oldest correspondence schools in the nation, founded in 1890 as the Blackstone School of Law in Chicago. In the early 1900s, the Modern American Law Series was developed for the program and was enthusiastically received by the legal community and laymen alike as a simple yet authoritative commentary on the law. In the late 1970s, Blackstone became a legal assistant/paralegal school and moved to Dallas, Texas. Additional study units on legal research, ethics, and employment skills were added so that graduating students could sit for the Certified Legal Assistant (CLA/CP) exam. In 2001, Direct Learning Systems Inc., an online publishing company, purchased the Blackstone legal assistant/ paralegal school from the retiring owner and relocated to Pennsylvania. Shortly after, the name was changed to Blackstone Career Institute (BCI), currently offering distance education programs in a variety of career fields in addition to continuing legal education courses.

ACADEMIC CALENDAR

Offering open admission, students can enroll at any time and start their studies immediately.

ACCREDITATION

Blackstone Career Institute is an online school accredited by the Distance Education Accrediting Commission (DEAC), Washington, D.C., regionally accredited by the Middle States Commission on Secondary Schools, and is a private licensed school regulated by the Pennsylvania State Board of Private Licensed Schools.

GRADING SYSTEM

| <u>Letter Grade</u> | <u>Numerical Equivalent</u> |
|---------------------|-----------------------------|
| A | 94-100 |
| B | 86-93 |
| C | 78-85 |
| D | 70-77 |
| F | Below 70 |

Any student who attains a final average of 94-100% at the end of their career training program will qualify as graduating "with Distinction." The certificate issued upon graduation will note this honor.

Mission Statement

"A pioneer in distance education, Blackstone Career Institute has been meeting the needs of adult learners since 1890. The school's mission is to change people's lives through education, teaching them new skills and preparing them for entry-level careers in today's high demand fields. Blackstone offers adult learners convenient and affordable training that accommodates their busy schedules while helping them successfully meet their educational goals. As a nationally and regionally accredited school, we fulfill our mission by providing high-quality, effective, technology-driven distance education programs and services."

RELEASE OF INFORMATION

In compliance with the Family Educational Rights and Privacy Act of 1974, this information is transferred at the request of the student. The recipient will not permit any other party access to the information without written consent of the student.

AUTHENTICITY: This Transcript contains an indelible Water Mark Logo. It is transparent and visible from both sides. Hold up to light to verify. Attempts to copy this document will result in the word "VOID" appearing on the copy.

PROOF OF SERVICE BY MAIL

BY PERSON IN STATE CUSTODY

(Fed. R. Civ. P. 5; 28 U.S.C. § 1746)

I, Jesse Ross, declare:

I am over 18 years of age and a party to this action. I am a resident of High Desert
State Prison Prison,

in the county of Clark County Nevada

My prison address is: P.O. Box 650 Indian
Springs NV. 89070

On 11-1-18,
(DATE)

I served the attached: motion for costs & fees (Fed. R.Civ.
P. Rule 54(d)(1)).
(DESCRIBE DOCUMENT)

on the parties herein by placing true and correct copies thereof, enclosed in a sealed envelope,
with postage thereon fully paid, in the United States Mail in a deposit box so provided at the
above-named correctional institution in which I am presently confined. The envelope was
addressed as follows:

Jared Frost N.V.-Ago 555 East Washington Ave
#3900 Las Vegas NV 89101

I declare under penalty of perjury under the laws of the United States of America that the
forgoing is true and correct.

Executed on 11-1-18
(DATE)

Jesse Ross
(DECLARANT'S SIGNATURE)

Case Ross #1095156
HSD - P.O. Box 650
Indian Springs NV.
89070

mm for costs/fees
Ross v Sanderson et al,
USDC No:
2:17-cv-02386-APG-GWF

1725385

1725385

Clerk
USDC-D.NEV

Lucy D. George U.S. Courthouse
333 Las Vegas Blvd. S.E. - Rm 1334
Las Vegas N.V. 89101

Legal Mail

3762